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**Attorneys for Defendant**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**  
  
**Plaintiff,**  
  
**v.**

**PIROUZ SEDAGHATY, et al.,**  
  
**Defendant**

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**No. CR 05-60008 HO**

**JOINT REPORT ON**  
**DEFENDANT'S MOTION TO**  
**UNSEAL SEALED UNCLASSIFIED**  
**VERSIONS OF TRANSCRIPTS**  
**AND DOCUMENTS**

On September 30, 2011, the defense met with AUSA Charles Gorder to discuss Defendant's Motion to Unseal Sealed Unclassified Versions of Transcripts and Documents. CR 581.

Listed below are the documents defense counsel is requesting be  
unsealed and the government's comments:

CR 199 July 13, 2009 hearing, page 48

The government does not object to this page being unsealed.

CR 490, Defense declarations concerning government closing  
CR 492 argument

The government objects to these declarations being  
unsealed.

CR 508 Declaration of Colleen Anderson concerning government  
closing argument

The government objects to this declaration being unsealed.

CR 481 Pursuant to the Court's order of September 29, 2010, (CR  
481) the Court Security Officer has provided a redacted set  
of transcripts of several of the Court's in camera proceedings  
during trial. The defense requests these transcripts be filed  
on the public record.

The government does not object to filing these redacted  
transcripts on the public record.

CR 454 Day one of trial, September 11, 2010.

The government does not object to a redacted version being  
filed publicly. The government and defense propose that the  
redaction should replace the juror names with juror initials  
in order to preserve the ability to accurately raise any legal  
issues with the Ninth Circuit.

CR 465 Unredacted jury verdict.

The defense agrees that if the only words redacted from the verdict form is the foreman's name, the redacted version is acceptable and the unredacted version does not need to be made public. If anything else is redacted, this issue will need to be revisited.

CR 473 Unredacted day eight of trial, September 9, 2011 (CR 472 orders a redacted version of the transcript be filed on the docket)

The government does not object to a redacted version being filed publicly. The government and defense propose that the redaction should replace the juror names with juror initials in order to preserve the ability to accurately raise any legal issues with the Ninth Circuit.

Respectfully submitted this 4<sup>th</sup> day of October, 2011.

/s/ Steven T. Wax

Steven T. Wax

Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar